

STONE MAGNANINI

COMPLEX LITIGATION

March 29, 2024

VIA CM/ECF

Hon. Vincent L. Briccetti
United States District Judge
United States Courthouse
300 Quarropas Street, Room 630
White Plains, NY 10601

Re: *Hayden v. IBM et al.*, Case No. 7:21-cv-02485-VB

Dear Judge Briccetti:

Pursuant to Docket No. 224, the parties hereby submit a further joint status report on settlement discussions. The parties concluded all discovery on March 27, 2024 with the completion of the final expert deposition. The parties discussed the potential for settlement with Judge McCarthy at the March 8, 2024 Case Management Conference, but these discussions did not advance the parties' positions.

Plaintiff's position is that settlement may be possible in this case with your Honor's assistance or guidance. Defendants' position is that the parties remain far apart and are not in a position to have further meaningful discussions at this time, but will be prepared to discuss further with the Court during the upcoming Case Management Conference on April 10.

Respectfully submitted,

/s/ Robert A. Magnanini

Robert A. Magnanini
Managing Partner

cc: All Counsel of Record (via CM/ECF)